

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

In re:

DUAL D HEALTH CARE
OPERATIONS, INC. d/b/a KEMP
CARE CENTER, LLC.

Debtor.

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CASE NO. 17-41320-elm

SHAWN K. BROWN, Chapter 7
Trustee for Dual D Health Care Operations,
Inc. d/b/a Kemp Care Center, LLC,

Plaintiff,

v.

LLOYD DOUGLAS, Individually, *et al.*,

Defendants.

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ADVERSARY NO. 20-04059

In re:

SPECIALTY SELECT CARE CENTER
OF SAN ANTONIO, LLC

Debtor,

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CASE NO. 17-44248-elm-7

SHAWN K. BROWN, Chapter 7
Trustee for Specialty Select Care Center
of San Antonio, LLC,

Plaintiff,

v.

LLOYD DOUGLAS, Individually, *et al.*,

Defendants.

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ADVERSARY NO. 20-04060

DECLARATION OF JERRY M. CHANG

I, Jerry M. Chang, hereby declare the following and hereby certify, under penalty of perjury pursuant to the laws of the United States and the State of Texas, that it is true and correct to the best of my knowledge, information, and belief:

1. “My name is Jerry M. Chang, I am over the age of 18 years, and am competent and otherwise qualified to make this Declaration. The matters stated herein are all true and correct to the best of my knowledge, information, and belief.

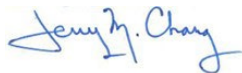
2. I have been engaged as an expert by Shawn K. Brown, Chapter 7 Trustee and Plaintiff herein, in connection with the above styled and numbered Adversary Proceedings. As part of my analysis of the Debtor I was provided access to QuickBooks records by the Debtor.

3. Later, I was asked to provide, to counsel for the Trustee, pdf digital files of certain of the QuickBooks records I reviewed. This was accomplished by clicking on the QuickBooks print report to pdf function. These reports were then provided to counsel for the Trustee.

4. I am advised by counsel for the Trustee the reports are marked as Plaintiffs’ Exhibits 115 through 132.

5. The pdf reports provided to Trustee’s counsel and marked Exhibits 115 through 132 are true and correct, and unaltered, copies of the original QuickBooks files as provided to me.

DECLARED under penalty of perjury this 19th day of March 2024.



Jerry M. Chang, CFA